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10 *Attorneys for Defendants*
11 *C. R. Bard, Inc. and*
12 *Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

16 IN RE: Bard IVC Filters Products
17 Liability Litigation

No. 2:15-MD-02641-DGC

**DEFENDANTS' MOTION FOR
EXTENSION AND DATE CERTAIN
FOR SEALING TRIAL EXHIBITS IN
JONES MDL CASE**

21 Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
22 "Bard") hereby respectfully move this Court, for an additional extension of the redaction
23 request deadlines and to set a date certain for motions addressing the confidentiality of
exhibits admitted into evidence during the *Jones v. Bard* trial.

25 The current redaction request deadline is August 30, 2018. Bard requests that the
26 Court extend the deadline and set a date certain after the Pretrial Conference in *Hyde v.*
27 *Bard* on September 6, 2018, when the Court has indicated that it will address the issues of
28 redaction and sealing of exhibits. Bard only seeks the opportunity to seal certain exhibits

1 that were admitted in *Jones* and that were not admitted in *Booker* and were not addressed
2 by the Court's prior rulings. Bard believes that this revised deadline will be more efficient
3 for the parties and the Court in addressing these issues after the parties have further
4 discussed it on September 6, 2018.

5 RESPECTFULLY SUBMITTED this 30th day of August, 2018.

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7 /s/ Richard B. North, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

s/ Richard B. North, Jr.

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